

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Wayne Sampson Cooper, Jr. and Stephanie Anne Cooper	Chapter 13 Bankruptcy No. 24-14055-pmm
Debtor(s)	
Bank of America, N.A., or its Successor or Assignee Movant	
vs.	
KENNETH E. WEST, Trustee Wayne Sampson Cooper, Jr. and Stephanie Anne Cooper	
Respondent(s)	

**OBJECTION OF BANK OF AMERICA, N.A. TO CONFIRMATION OF THE DEBTORS'
CHAPTER 13 PLAN**

Bank of America, N.A. (hereinafter "Creditor"), a secured creditor of the above Debtors, by its counsel hereby objects to the Debtor's Chapter 13 Plan (hereinafter "Plan") as follows:

1. Creditor holds a secured interest in the Debtors' motor vehicle, a 2022 JEEP WRANGLER 4XE, ("Collateral"), bearing and identified by VIN Number 1C4JJXP68NW198111, pursuant to a Motor Vehicle Installment Sales Contract ("Contract"), dated May 21, 2022, between the parties.

2. Creditor filed a Proof of Claim on November 20, 2024 at Claim 1-1, listing a secured claim in the amount of \$45,273.18, and an arrearage claim in the amount of \$1,064.77.

3. Creditor objects as Debtors' Plan lists Creditor's claim in §4(a), as receiving no distribution from the Trustee.

4. Creditor objects to the confirmation of Debtors' Chapter 13 Plan as it fails to adequately provide for payment of pre-petition arrears to Secured Creditor.

5. Creditor objects to confirmation as Debtors' Chapter 13 Plan does not provide for Secured Creditor to receive distributions with a value equal to the allowed amount of its claim.

WHEREFORE, for the foregoing reasons, Bank of America, N.A requests that an Order be entered denying confirmation of the Chapter 13 Plan and for such other and further relief as is just.

/s/ Andrew M. Lubin
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